

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)
v.)
TONY WEBSTER)
CRIMINAL NO. 1:07CR492)

IN OPEN COURT
DEC 20 2007
CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

STATEMENT OF FACTS

Were this matter to go to trial, the United States of America would prove the following facts beyond a reasonable doubt:

1. Beginning in or about 2006, and continuing thereafter up to and including on or about September 26, 2007, in Fauquier County, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant TONY WEBSTER did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree with Jason Webster, Richard Webster, Troy Washington, James Leon Webster, Jackie Webster, Robert Jones, Raymond Darby, Christopher Flanagan, Allen Lewis, Kim Bundy, and others, both known and unknown, to unlawfully, knowingly and intentionally distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

2. During the course of the conspiracy the defendant distributed crack cocaine to James Webster, Richard Webster, Troy Washington, Jackie Webster, Robert Jones, Chris Flanagan, Jason Webster, Allen Lewis, Raymond Darby and others on a regular basis. These deals took

place at Sillamon Road in Fauquier County, Virginia, and elsewhere within Eastern District of Virginia. The defendant knew that these individuals were going to re-distribute the crack cocaine supplied by him.

3. During the course of the conspiracy the defendant obtained powder and crack cocaine from a source of supply in Philadelphia, Pennsylvania. The defendant transported this cocaine and crack cocaine to Fauquier County, Virginia, within the Eastern District of Virginia, where it was re-distributed.

4. During the course of the conspiracy, the defendant had powder cocaine cooked into crack at his residence in Fredericksburg, Virginia, within the Eastern District of Virginia. The defendant then distributed the crack cocaine in the Eastern District of Virginia.

5. During the course of the conspiracy the defendant sold or it was foreseeable to him that between 150 grams and 500 grams of crack cocaine was distributed in furtherance of the conspiracy. The defendant was arrested for this conduct on September 27, 2007, and has been held in custody without bond on the instant charge.

6. The acts described above were done willfully and knowingly and with the specific intent to violate the law, and not by accident, mistake, inadvertence, or other innocent reason.

7. During the course of the conspiracy, the defendant TONY WEBSTER used a green 1998 Ford Expedition, Vehicle Identification Number 1FMFU18L4WLA07474, to facilitate and further the conspiracy to distribute crack cocaine.

8. This statement of facts does not contain each and every fact known to the defendant and to the United States concerning the defendant's and others' involvement in the charges set forth in the plea agreement.

Respectfully submitted,

Chuck Rosenberg
United States Attorney

By:


Steven D. Mellin
Assistant United States Attorney

After consulting with my attorney, I hereby stipulate that the above statement of facts is true and accurate, and that had this matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

SEEN AND AGREED TO BY:

Tonywebster
TONY WEBSTER
Defendant

Kenneth P. Troccoli
Kenneth P. Troccoli, Esq.
Counsel for Defendant